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ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**ALI SALEEM BEY and JOHN  
MUHAMMAD BEY,**

**Plaintiffs,**

**vs.**

**CITY OF OAKLAND, et al.,**

**Defendants**

**Case No: 14-cv-01626-JSC**

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL**

**Hearing Date:**

**Time:**

**Courtroom: F**

**Location: 15th Floor  
450 Golden Gate Ave.  
San Francisco, CA**

**Judge: The Hon. Jacqueline S. Corley**

Plaintiffs **ALI SALEEM BEY** and **JOHN MUHAMMAD BEY** submit this application pursuant to Rule 7-11 of the Civil Local Rules for an order authorizing the Plaintiffs to file documents in support of their Motion for Appointment of an Individual Investigator under seal. This motion is based on the grounds that documents at issue, produced by Defendant City of Oakland are confidential and have been marked confidential in accordance with the Protective Order (Docket No. 96). Specifically, the documents at issue include police reports, investigation reports, and other confidential documents related to police investigation. As such, the documents should be filed under seal.

Courts have long recognized a “general right to inspect and copy public records and documents, including judicial records and documents.” *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 597 & n.7 (1978). But this right is not absolute. To balance the competing interests of the public’s right of inspection against litigants’ need for confidentiality, a party seeking to file under seal matters related to dispositive motions must provide “compelling reasons” to do so. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006). A compelling reason exists in this case because the documents relate to confidential police investigations and have been deemed confidential and subject to the protective order.

Plaintiffs respectfully request that the Court grant their motion to file the following documents under seal:

- a. Declaration of John Bey in Support of Plaintiff’s Reply Brief [Doc. 131]
- b. Declaration of Ali Saleem Bey in Support of Plaintiff’s Reply Brief [Doc. 132]
- c. Exhibit 27, Longmire DOJ Testimony
- d. Exhibit 28, Complaint Investigation Report, March 18, 2014;
- e. Exhibit 30, Joyner, DOJ Testimony
- f. Exhibit 33, Longmire DOJ Testimony
- g. Exhibit 35, Joyner, DOJ Testimony
- h. Exhibit 36, Joyner, DOJ Testimony
- i. Exhibit 38, Longmire DOJ Testimony
- j. Exhibit 39, Longmire DOJ Testimony
- k. Exhibit 40, DOJ Investigation of Longmire Cover
- l. Exhibit 41, Joyner, DOJ Testimony
- m. Exhibit 42, Joyner, DOJ Testimony

DATED: March 9, 2018

RESPECTFULLY SUBMITTED  
LAW OFFICES OF BONNER AND BONNER

By: /s/ CHARLES A. BONNER  
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ATTORNEY FOR PLAINTIFF